



LOWEY DANNENBERG, P.C.

January 6, 2023

**VIA ECF**

The Honorable Sidney H. Stein  
Daniel Patrick Moynihan  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

**Re: *Sonterra Capital Master Fund Ltd., et al. v. Credit Suisse Group AG, et al.*, No. 15-cv-00871-SHS (S.D.N.Y.)**

Dear Judge Stein:

We represent Plaintiffs in the above-captioned matter.

We are pleased to report that Plaintiffs have executed a binding settlement term sheet with NEX Group plc, NEX International Limited (f/k/a ICAP plc), ICAP Capital Markets LLC (n/k/a Intercapital Capital Markets LLC), ICAP Securities USA LLC, and ICAP Europe Limited (collectively, "ICAP") and are working to finalize a stipulation and agreement of settlement. Accordingly, we jointly request with ICAP that all litigation proceedings and deadlines between Plaintiffs and ICAP be temporarily stayed (*see* ECF No. 398) until February 10, 2023 when Plaintiffs anticipate they will file a motion that seeks preliminary approval of their settlement with ICAP.

Plaintiffs previously reached a settlement with JPMorgan Chase & Co. ("JPMorgan") that the Court preliminarily approved. *See* ECF Nos. 149-51, 159. Plaintiffs also reached settlements with Defendants NatWest Markets Plc (f/k/a The Royal Bank of Scotland plc) ("RBS"), Deutsche Bank AG and DB Group Services (UK) Ltd. (collectively, "Deutsche Bank"), and Credit Suisse Group AG and Credit Suisse AG (collectively, "Credit Suisse") and filed motions for preliminary approval in connection with each of these settlements that are currently pending before the Court. *See, e.g.*, ECF Nos. 382-87, 389-95.

We are available to address any questions Your Honor may have.

Respectfully,

/s/ Vincent Briganti  
Vincent Briganti

cc: All Counsel of Record (via ECF)